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IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF MARTIE
KUTSCHER IN SUPPORT OF
FACEBOOK, INC.'S REQUEST TO
APPROVE FACEBOOK'S SEARCH
STRING PROPOSAL FOR CUSTODIAN
GROUPS 1-4**

I, Martie Kutscher, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. ("Facebook") in the above-captioned matter. I am a member in good standing of the State Bars of California, New Jersey, and New York. I submit this declaration in support of Facebook's Request to Approve Facebook's Search String Proposal for Custodian Groups 1-4. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct copy of Facebook's final search string proposal, as of October 16, 2020, for the 38 custodians in Custodian Groups 1-4 is attached hereto as **Exhibit A**.

3. A true and correct copy of the search strings agreed upon by the Parties, as of October 16, 2020, for the 38 custodians in Custodian Groups 1-4, is attached hereto as **Exhibit B**.

4. A true and correct copy of the list of search strings that remain in dispute, as of October 16, 2020, for the 38 custodians in Custodian Groups 1-4, is attached hereto as **Exhibit C**.

5. A true and correct list of the Requests for Production contained within the Second, Third, and Fourth Sets of Requests for Production served by Plaintiffs in this action is attached hereto as **Exhibit D**. For ease of review, an attorney in my office consolidated these requests into a single document.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 16, 2020 in Palo Alto, California.

/s/ *Martie Kutscher*

Martie Kutscher